

County of Sullivan, New York

USDA –RUS / Community Connect Broadband Grant Comments

Program regulations / guidelines suggested for amendment include the following:

- **Eliminate the Requirement:**

- Of establishing a community facility;
- Of funding a single community only;
- Of having a community –oriented connectivity plan;
- A community have no existing broadband service to any resident or business in that community, and propose serving underserved areas;
- The applicant must own and operate the broadband facilities proposed in its application; and
- Projects provide basic broadband transmission service at no cost for at least two years to all critical community facilities within the proposed area, and provide a community center with at least ten computer access points within the proposed service area, and make broadband transmission service available at no cost to users for at least two years.

- **Permit / Allow:**

- Counties to act as lead applicants;
- Contracting out the provision of broadband service or applicants partnering w/ broadband operators;
- Provision of basic broadband transmission service at discounted rates;
- That if a community does not intend to own the broadband facilities, a commercial broadband service provider may be the legal applicant or the broadband partner;
- Applicants being able to use matching funds to cover operating costs of broadband projects;
- Applicants being able to use funds for an entire geographic area instead of for a single community; and
- Allow application scoring criteria to include factors such as the speed of proposed broadband service, and the level of service provided to people with disabilities.

- **Other Suggestions / Areas of Concern:**

- **Matching Requirement:**

- Reduce the matching contribution requirement to 5% or 10%

- **Demographics:**

- 70,000 population density insufficient – expanding to 125,000 FTE (*Summer 300,000*) to meet guidelines; and
 - Our community areas (villages and towns/ hamlets) have low population density being unable to satisfy program eligibility requirements – we are a rural area in need of broadband expansion.

- **Geography / Topography:**

- River Corridor/ Mountainous Region / Appalachian Zone, REAP Zones – we need to qualify our region as Top Priority w/ our location being two (2) hours away from NYC, Albany, Philadelphia, etc.;

- **Economic Development:**

- Our area has a high unemployment rate, and as long as the broadband grant criteria is tied to “traditional jobs” we will lose because individual businesses rely on broadband access the same as we rely on electricity and running water;
 - All indicators (*poor health, school lunches, median income, etc.*) – Sullivan County has all the attributes of a poverty zone, both in urban and rural areas of the County; and
 - Agriculture businesses need broadband because Ag offices are closing and there is no other resource close by.